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January 27, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68; *IP-Enabled Services*, WC Docket No. 04-36; *Connect America Fund*, WC Docket No. 10-90; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135

Dear Ms. Dortch:

On January 26, 2011, Jennie Chandra, Eric Einhorn, and I, from Windstream Communications, Inc. ("Windstream"), met with Brad Gillen, Legal Advisor to Commissioner Meredith Attwell Baker. Consistent with its filings in the above-referenced dockets, Windstream discussed the need for comprehensive, rational reform of the intercarrier compensation system and the universal service high-cost program..

Windstream warned that a significant reduction in intercarrier compensation payments and/or frozen ICLS funding could slow network deployment and could even result in the withdrawal of investment in existing facilities. Given this concern, Windstream – consistent with the January 18, 2011, letter from the CEOs of CenturyLink, Qwest, Frontier, and Windstream to FCC Chairman Julius Genachowski<sup>1</sup> – urged the Commission to act now to confirm that VoIP traffic terminating to the PSTN is subject to the same intercarrier compensation rules as other voice providers with whom they compete. Windstream also noted that it is essential that the company continue to receive frozen ICLS.

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<sup>1</sup> Letter from Glen F. Post, III, Chief Executive Officer and President of CenturyLink, Inc., Maggie Wilderotter, Chairman and Chief Executive Officer of Frontier Communications, Ed Mueller, Chairman and Chief Executive Officer of Qwest Communications, and Jeff Gardner, President and Chief Executive Officer of Windstream, to Julius Genachowski, Chairman, Federal Communications Commission, GN Docket No. 09-51, WC Docket Nos. 07-135, 05-337, 04-36, CC Docket Nos. 01-92, 99-68 (January 18, 2011).

With regard to universal service support, Windstream distributed the attached handout and discussed how the current high-cost funding mechanisms create a “rural-rural divide,” in which a very small number of rural Americans have access to very robust broadband, while many others similarly situated have no access to broadband at all. Windstream reiterated its stance that universal service funding should respond directly to the cost of deploying and sustaining voice and broadband networks in high-cost areas, rather than the size of the companies serving those areas.

Sincerely,

/s/

Malena F. Barzilai

Attachment

cc: Brad Gillen